

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**Re D.I. 1880**

**CERTIFICATION OF COUNSEL REGARDING AGREED ORDER  
GRANTING MOTION OF TERRAFORM LABS PTE LTD. FOR LEAVE TO  
SERVE RULE 45 DOCUMENT SUBPOENAS ON DEBTORS**

I, Daniel N. Brogan, counsel to Terraform Labs PTE Ltd. (“TFL”) hereby certify as follows to the best of my knowledge, information, and belief:

1. On June 19, 2023, TFL filed its *Motion of Terraform Labs PTE Ltd. For Leave to Serve Rule 45 Document Subpoenas on Debtors* [D.I. 1880] (the “Motion”). Attached to the Motion as Exhibit B was a proposed form of order granting the Motion (the “Original Order”).

2. Objections or other responses to the Motion were due on or before July 26, 2023 at 4:00 p.m. (the “Response Deadline”). By agreement with TFL, the Response Deadline was extended for the above-captioned Debtors (the “Debtors”) only through July 31, 2023 at 12:00 p.m.

3. As of the date hereof, no formal objections or other responses to the Motion have been filed or served on TFL. However, prior to the Response Deadline, TFL did receive certain informal comments (the “Informal Comments”) from counsel to the Debtors.

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<sup>1</sup> The last four digits of FTX Trading Ltd. and West Realm Shires Services Inc. d/b/a FTX US’s respective tax identification numbers are 3288 and 4002. A complete list of the numerous Debtors in these Chapter 11 cases, and their federal tax identification numbers, is available at <https://cases.ra.kroll.com/FTX>. Debtor Emergent Fidelity Technologies Ltd.’s principal place of business is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

4. The Debtors and TFL resolved the Debtors' Informal Comments by agreeing to a revised proposed form of order granting the Motion, a copy of which is attached hereto as Exhibit A (the "Revised Order"). A blackline comparison showing the changes made between the Original Order and Revised Order is attached hereto as Exhibit B.

WHEREFORE, TFL respectfully requests the court enter the Revised Order at its earliest convenience.

Date: July 31, 2023

**BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP**

/s/ Daniel N. Brogan

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